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Attorneys for Defendant,
SANTANDER CONSUMER USA, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TIEKA BROWN,

Plaintiff,

vs.

TRANS UNION LLC; EXPERIAN
INFORMATION SOLUTIONS, INC.;
NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC.; INNOVIS
DATA SOLUTIONS, INC.; CLARITY
SERVICES, INC.; CAPITAL ONE FINANCIAL
CORPORATION; SYNOVUS BANK DBA
FIRST PROGRESS AND SANTANDER
CONSUMER USA INC.,

Defendants.

Case No.: 2:25-cv-00013-JCM-DJA

**JOINT MOTION AND ORDER
STAYING DISCOVERY AS TO DEFENDANT
SANTANDER CONSUMER USA INC.**

Defendant SANTANDER CONSUMER USA, INC. (“Santander”) and Plaintiff TIEKA BROWN (“Plaintiff” and together with Santander, the “Parties”) hereby stipulate as follows:

1. Santander is the only Defendant in this action that has not yet settled with Plaintiff.
2. Santander and Plaintiff are currently engaged in informal settlement discussions.
3. In addition, Plaintiff’s claims against Santander may be subject to an arbitration agreement, and if the Parties are unable to reach an informal settlement, they may stipulate to arbitrate Plaintiff’s claims and stay this action as to Santander.

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4. To minimize attorneys' fees and facilitate settlement, the Parties seek a stay of discovery as to Santander and request that the Court delay setting any Scheduling Order or Conference for 30-60 days.

IT IS SO STIPULATED

DATED this 15th day of May, 2025

DATED this 15th day of May, 2025

SPRINGEL & FINK LLP

FREEDOM LAW FIRM

/s/ Leonard T. Fink

/s/ Gerardo Avalos

By:

By:

LEONARD T. FINK, ESQ.
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Attorneys for Defendant,
SANTANDER CONSUMER USA, INC.

GERARDO AVALOS, ESQ.
Nevada Bar No. 15171
8985 S. Eastern Avenue, Suite 100
Las Vegas, NV 89123
Attorneys for Plaintiff,
TIEKA BROWN

The Court finds that Plaintiff Tieka Brown and Defendant Santander Consumer USA, Inc. have shown good cause to stay discovery. *See Schrader v. Wynn*, No. 2:19-cv-02159-JCM-BNW, 2021 WL 4810324, at *4 (D. Nev. Oct. 14, 2021).

IT IS THEREFORE ORDERED that the stipulation (ECF No. 36) is **GRANTED**.

IT IS FURTHER ORDERED that Plaintiff and Santander must file their stipulated discovery plan and scheduling order on or before **July 15, 2025**.



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: May 19, 2025

CERTIFICATE OF SERVICE
Tieka Brown v. Trans Union LLC, et al.
U.S.D.C. Case No.: 2:25-cv-00013-JCM-DJA

STATE OF NEVADA)
) ss.
 COUNTY OF CLARK)

I, Ella Wilczynski, declare:

I am a resident of and employed in Clark County, Nevada. I am over the age of eighteen years and not a party to the within action. My business address is 9075 W. Diablo Drive, Suite 302, Las Vegas, Nevada, 89148.

On May 15, 2025, I served the document described as ***Joint Motion and Proposed Order Staying Discovery as to Defendant Santander Consumer USA Inc.*** on the following parties:

| | |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | VIA ELECTRONIC SERVICE: by submitting the foregoing to the United States District Court for the District of Nevada's ECF-filing System for Electronic Service upon the Court's Service List pursuant to Rule 26(a)(1). The copy of the document electronically served bears a notation of the date and time of service. The original document will be maintained with the document(s) served and be made available, upon reasonable notice, for inspection by counsel or the Court. |
| <input type="checkbox"/> | VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas Nevada. I am "readily familiar" with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. postal service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. |
| <input type="checkbox"/> | VIA FACSIMILE: by transmitting to a facsimile machine maintained by the person on whom it is served at the facsimile machine telephone number at last given by that person on any document which he/she has filed in the cause and served on the party making the service. The copy of the document served by facsimile transmission bears a notation of the date and place of transmission and the facsimile telephone number to which transmitted. A confirmation of the transmission containing the facsimile telephone numbers to which the document(s) was/were transmitted will be maintained with the document(s) served. |

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Ella Wilczynski

 An employee of Springel & Fink LLP

From: [Lisa Lawrence](#)
To: [Ella Wilczynski](#)
Subject: FW: Discovery Conference - Brown, T. (Case No. 2:2025-cv-00013)
Date: Thursday, May 15, 2025 1:21:04 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)
[image008.png](#)
[2025.04.24 Brown, Tiekka - Stipulation and Proposed Order.docx](#)

Hi, Ella. PC's assent for the stipulation is below. Thanks so much!

Best regards,

Lisa

Lisa M. Lawrence
YU | MOHANDESI LLP
633 West Fifth Street, Suite 2800
Los Angeles, CA 90071
213.377.5504 Direct | 213.377.5501 Fax

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From: Gerardo Avalos <gavalos@freedomlegalteam.com>
Date: Friday, May 2, 2025 at 12:51 PM
To: Lisa Lawrence <llawrence@yumollp.com>
Cc: Khaay Bulanon <kbulanon@freedomlegalteam.com>, Leonard Fink <lfink@springelfink.com>, Jordan Yu <jyu@yumollp.com>
Subject: RE: Discovery Conference - Brown, T. (Case No. 2:2025-cv-00013)

Hi Lisa,

We did review the arbitration clauses provided and our Client will stipulate to arbitration if we are not able to settle. I am fully booked today but we can schedule a call Monday between 11am and 2pm or Tuesday any time after 1:30pm. Please let me know which time works best for you. In the meantime you have my authority to file the stipulation and order and this will at least avoid us having to file a discovery plan as discussed. Thank you all, happy Friday and have a great weekend.

Kind regards,

Gerardo Avalos, Esq.

Consumer Litigation Attorney

Freedom Law Firm

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